

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:)	
)	Chapter 11
)	
NEIMAN MARCUS GROUP LTD LLC, <i>et al.</i> , ¹)	Case No. 20-32519 (DRJ)
)	
Debtors.)	(Jointly Administered)
)	

**NOTICE OF JACKSON WALKER LLP'S FIRST MONTHLY FEE STATEMENT FOR
COMPENSATION OF SERVICES RENDERED AND REIMBURSEMENT OF
EXPENSES AS CO-COUNSEL AND CONFLICTS COUNSEL TO THE DEBTORS
FOR THE PERIOD FROM MAY 7, 2020 THROUGH MAY 31, 2020**

Name of Applicant:	Jackson Walker LLP.	
Applicant’s Role in Case:	Co-counsel and Conflicts Counsel to Debtors	
Date Order of Employment Signed:	June 25, 2020 [ECF No. 1017]	
	Beginning of Period:	End of Period
Time period covered by this Statement:	May 7, 2020	May 31, 2020
Summary of Total Fees and Expenses Requested		
Total fees requested in this Statement:		\$87,855.60 (80% of \$109,819.50)
Total expenses requested in this Statement:		\$15.70
Total fees and expenses requested in this Statement (inclusive of 20% Holdback):		\$109,835.20
Summary of Attorney Fees Requested		
Total attorney fees requested in this Statement:		\$102,904.00
Total actual attorney hours covered by this Statement:		158.10
Average hourly rate for attorneys:		\$650.89

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: Neiman Marcus Group LTD LLC (9435); Bergdorf Goodman Inc. (5530); Bergdorf Graphics, Inc. (9271); BG Productions, Inc. (3650); Mariposa Borrower, Inc. (9015); Mariposa Intermediate Holdings LLC (5829); NEMA Beverage Corporation (3412); NEMA Beverage Holding Corporation (9264); NEMA Beverage Parent Corporation (9262); NM Bermuda, LLC (2943); NM Financial Services, Inc. (2446); NM Nevada Trust (3700); NMG California Salon LLC (9242); NMG Florida Salon LLC (9269); NMG Global Mobility, Inc. (0664); NMG Notes PropCo LLC (1102); NMG Salon Holdings LLC (5236); NMG Salons LLC (1570); NMG Term Loan PropCo LLC (0786); NMG Texas Salon LLC (0318); NMGP, LLC (1558); The Neiman Marcus Group LLC (9509); The NMG Subsidiary LLC (6074); and Worth Avenue Leasing Company (5996). The Debtors' service address is: One Marcus Square, 1618 Main Street, Dallas, Texas 75201.

Summary of Paraprofessional Fees Requested	
Total paraprofessional fees requested in this Statement:	\$6,915.00
Total actual paraprofessional hours covered by this Statement:	38.30
Average hourly rate for paraprofessionals:	\$180.56

In accordance with the *Amended Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals* [ECF No. 1070], each party receiving notice of the monthly fee statement will have until 4:00 p.m. (Prevailing Central Time), 21 days after service of the monthly fee statement to object to the requested fees and expenses. Upon the expiration of such 21-day period, the Debtors are authorized to pay the Professional an amount of 80% of the fees and 100% of the expenses requested in the applicable monthly fee statement.

Pursuant to §§ 327, 330, and 331 of title 11 of the United States Code (the “Bankruptcy Code”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), Rule 2016-1 of the Bankruptcy Local Rules for the Southern District of Texas (the “Bankruptcy Local Rules”), and the *Amended Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals* (the “Fee Procedures Order”) [ECF No. 1070], Jackson Walker LLP (“JW”), as co-counsel and conflicts counsel to the Debtors, hereby files its *First Monthly Fee Statement for Compensation of Services Rendered and Reimbursement of Expenses as Co-Counsel and Conflicts Counsel to the Debtors for the Period from May 7, 2020 Through May 31, 2020* (“Monthly Fee Statement”).

1. By this Monthly Fee Statement, and pursuant to the Fee Procedures Order, JW seeks interim payment of \$87,855.60 (80% of \$109,819.50) as compensation for professional services rendered to the Debtors during the period from May 7, 2020 through May 31, 2020 (the “Fee Period”); and (ii) \$15.70 for reimbursement of actual and necessary expenses, for a total of \$87,871.30 for the Fee Period.

2. In support of the Monthly Fee Statement, JW submits a Summary of Expenses for the Fee Period, attached hereto as **Exhibit A**, a Summary of Legal Fees by Category as Co-Counsel and Conflicts Counsel for the Fee Period attached hereto as **Exhibit B**, and a Detailed Record of Fees as Co-Counsel for the Fee Period, attached hereto as **Exhibit C**.

3. Pursuant to the Fee Procedures Order, any party objecting to the payment of interim compensation and reimbursement of expenses shall, within twenty-one (21) days of service of the Monthly Fee Statement, serve via email to JW, and the following Application Recipients (as defined in the Fee Procedures Order), a written notice setting forth the precise nature of the objection and the amount at issue (the “Notice of Objection to Monthly Fee Statement”) on or before 4:00 p.m. (prevailing Central Time) twenty-one (21) days after service of this Monthly Fee Statement:

- (a) the Debtors, c/o Neiman Marcus Group LTD LLC Attn: Tracy M. Preston (tracy_preston@neimanmarcus.com);
- (b) co-counsel to the Debtors, Kirkland & Ellis LLP, Attn: Anup Sathy, P.C. (anup.sathy@kirkland.com), Chad J. Husnick (chad.husnick@kirkland.com), Matthew C. Fagen (matthew.fagen@kirkland.com), and Gary J. Kavarsky (gary.kavarsky@kirkland.com);
- (c) co-counsel for the Debtors, Jackson Walker LLP, Attn: Matthew D. Cavanaugh (mcavanaugh@jw.com) and Jennifer F. Wertz (jwertz@jw.com), Kristhy M. Peguero (kpeguero@jw.com), and Veronica A. Polnick (vpolnick@jw.com);
- (d) the Office of the U.S. Trustee for the Southern District of Texas, 515 Rusk Street, Suite 3516, Houston, Texas 77002, Attn: Hector Duran (hector.duran.jr@usdoj.gov) and Stephen Statham (stephen.statham@usdoj.gov);
- (e) counsel to the Official Committee of Unsecured Creditors, Pachulski Stang Ziehl & Jones LLP, 101000 Santa Monica Blvd, 13th Floor, Los Angeles, California 90067, Attn: Malhar S. Pagay (mpagay@pszjlaw.com);
- (f) counsel to the First Lien Lender Group, Wachtell, Lipton, Rosen & Katz, 51 West 52nd Street, New York, New York, 10016, Attn: Stephanie A. Marshak (samarshak@wlrk.com) and Joshua A. Feltman (jafeltman@wlrk.com); and
- (g) counsel to the Ad Hoc Noteholder Group, Paul, Weiss, Rifkind, Wharton & Garrison LLP, 1285 Avenue of the Americas, New York, New York, 10016, Attn: Alice Belisle Eaton (aeaton@paulweiss.com) and Andrew Rosenberg (arosenberg@paulweiss.com).

4. If a Notice of Objection to Monthly Fee Statement is timely served pursuant to the Fee Procedures Order, the objecting party and the Professional shall attempt to resolve the

objection on a consensual basis. If the parties reach an agreement, the Debtors shall promptly pay JW an amount equal to 80% of the agreed-upon fees and 100% of the agreed-upon expenses.

5. Although every effort has been made to include all fees and expenses incurred in the Fee Period, some fees and expenses might not be included in this Monthly Fee Statement due to delays caused by accounting and processing during the Fee Period. JW reserves the right to make further application to this Court for allowance of such fees and expenses not included herein. Subsequent Monthly Fee Statements will be filed in accordance with the Bankruptcy Code, the Bankruptcy Rules, and the Fee Procedures Order.

Houston, Texas
July 5, 2020

/s/ Matthew D. Cavanaugh

JACKSON WALKER L.L.P.

Matthew D. Cavanaugh (TX Bar No. 24062656)

Jennifer F. Wertz (TX Bar No. 24072822)

Kristhy M. Peguero (TX Bar No. 24102776)

Veronica A. Polnick (TX Bar No. 24079148)

1401 McKinney Street, Suite 1900

Houston, Texas 77010

Telephone: (713) 752-4200

Facsimile: (713) 752-4221

Email: mcavanaugh@jw.com

Email: jwertz@jw.com

Email: kpeguero@jw.com

Email: vpolnick@jw.com

Co-Counsel to the Debtor and Debtor in Possession

EXHIBIT A

SUMMARY OF EXPENSES FOR THE FEE PERIOD

EXPENSE	TOTAL
Research Services	\$15.70
TOTAL	\$15.70

EXHIBIT B**SUMMARY OF LEGAL FEES AND EXPENSES
BY CATEGORY FOR THE FEE PERIOD**

	DESCRIPTION	LEGAL FEES	EXPENSES	TOTAL
110	Case Administration	\$66,041.50		
115	Reporting	\$2,546.00		
140	Relief from Stay and Adequate Protection	\$447.00		
150	Meetings and Communications with Creditors	\$1,672.50		
160	Fee/Employment Applications	\$2,097.00		
210	Business Operations	\$693.50		
230	Financing and Cash Collateral	\$2,145.00		
240	Business Operations	\$51.00		
260	Corporate Governance	\$30,207.50		
310	Claims Administration and Objection	\$2,067.50		
320	Plan and Disclosure Statement	\$1,851.00		
	Totals	\$109,819.50	\$15.70	<u>\$109,835.20</u>

Total Fees for Fee Period	\$109,819.50
20% Fee Holdback for Fee Period	\$21,963.90
80% of Fees Amount for Fee Period	\$87,855.60
Expenses for Fee Period	\$15.70
TOTAL REQUEST	<u>\$87,871.30</u>

EXHIBIT C**DETAILED RECORD OF FEES FOR THE FEE PERIOD**

<u>Date</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Amount</u>	<u>Description</u>
<u>Case Administration:</u>				
05/07/20	M. Cavanaugh	17.5	13,125.00	Review and revise first day papers (5.3); prepare for chapter 11 filing and first day hearing (4.1); conferences with K&E team, Jackson Walker, advisor group, and Company re same (4.2); file chapter 11 cases (3.9).
05/07/20	K. Peguero	7.5	4,312.50	Summarize unique first day relief provisions for team (1.1); review and approve first day motions for filing (6.4)
05/07/20	J. Wertz	2.1	1,260.00	Assist with filing first day motions and petitions throughout filing of cases.
05/07/20	V. Argeroplos	2.0	890.00	Conference call with Kirkland team regarding filing cases today, prepare and file petitions.
05/07/20	D. Trevino	4.0	700.00	Review of various Voluntary Petitions and prepare for filing.
05/07/20	D. Trevino	0.2	35.00	Prepare documents containing dial in instructions for the First Day Hearings on 5/8/2020 and circulate to E. Freeman.
05/07/20	K. Gradney	6.4	1,184.00	Review and prepare for filing various petitions and process first day pleadings (5.1); review and prepare for filing first day declaration (.2); receive and review various pro hac vice motions for filing (.7); receive and review notice of electronic hearing and revise same (.2); receive and review agenda for first day hearing and prepare same for filing (.2).
05/08/20	M. Cavanaugh	9.9	7,425.00	Prepare for first day hearing (7.9); attend portion of witness preparation meeting with first day witnesses re first day testimony (1.0); review and revise first day presentation slide deck (1.0).
05/08/20	S. Coffey	3.2	2,192.00	Attend first day hearing.
05/08/20	E. Freeman	5.0	3,875.00	Confer with C. Husnick regarding hearing preparation (.4); participate in first day hearing (4.6).

<u>Date</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Amount</u>	<u>Description</u>
05/08/20	K. Peguero	10.0	5,750.00	Prepare for first day hearing (3.7); review and file revised orders (.6); attend first day hearing (5.7)
05/08/20	J. Wertz	4.2	2,520.00	Attend part of first day hearing on first day motions.
05/08/20	T. Dunn	5.7	3,420.00	Attend telephonic first day hearing.
05/08/20	S. Gosnell	2.4	1,116.00	Attend first day hearings.
05/08/20	M. Khan	2.3	885.50	Attend telephonic conference for first day hearing.
05/08/20	V. Polnick	5.8	2,958.00	Attend first day hearings, coordinate with the K&E regarding revised orders, various issues throughout hearing.
05/08/20	D. Trevino	0.4	70.00	Prepare chart for transmission to chambers with First Day Motions ECFs and Proposed Orders ECFs and circulate same.
05/08/20	D. Trevino	0.1	17.50	Circulate bridge line dial in to the First Day Hearings to the Jackson Walker Team.
05/08/20	D. Trevino	4.0	700.00	Attend first day hearing.
05/08/20	K. Gradney	6.4	1,184.00	Review various revised first day orders and prepare same for upload (.8); attend first day hearing and assist counsel (5.5); email correspondence with chambers regarding same (.1).
05/09/20	D. Trevino	0.3	52.50	Attention to orders entered by Judge, hearings and deadlines coming up and circulate to team internally.
05/11/20	V. Polnick	0.2	102.00	Communication with court regarding hearings for second days and circulate the information.
05/11/20	D. Trevino	0.1	17.50	Circulate to team a case contact sheet with professionals information.
05/11/20	D. Trevino	0.1	17.50	Attention to upcoming hearing dates and circulate same to team.

<u>Date</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Amount</u>	<u>Description</u>
05/12/20	M. Cavanaugh	2.1	1,575.00	Correspond with K&E team re postpetition workstream organization and next steps (.9); review reporting obligations summary (.8); correspond with K&E team re same (.4).
05/12/20	K. Peguero	0.3	172.50	Assist with post-filing logistics including e-dec (.3)
05/12/20	K. Gradney	0.4	74.00	Multiple email correspondence with KE team regarding signed e-declarations (.3); prepare e-declarations for signature (.1).
05/13/20	M. Cavanaugh	4.0	3,000.00	Review NMG chapter 11 case materials re upcoming priority items (1.5); prepare for and participate in telephone conference with K&E team re chapter 11 planning (1.5); telephone conference with JW team re workstream distribution (1.0)
05/13/20	C. Secord	0.8	372.00	Analyze complaint filed by pro se party and correspond with JW Team concerning same.
05/14/20	D. Trevino	0.1	17.50	Communication with JWDebtor team regarding the Creditor Matrix to be filed and format.
05/14/20	D. Trevino	0.6	105.00	Communication with Stretto and team internally regarding the format of the creditor matrix (.2) Communication with court's clerks office regarding the error on filing (.1) Receipt of correct format and prepare same for filing (.3)
05/18/20	M. Cavanaugh	3.5	2,625.00	Review and analyze NMG chapter 11 case and deal materials (1.5); telephone conference with JW and K&E team re planning steps (1.0); prepare for and participate in telephone conference with JW team re next steps (1.0)
05/18/20	V. Polnick	0.1	51.00	Discuss timing of response for the Neiman Marcus Motion.
05/20/20	M. Cavanaugh	0.8	600.00	Telephone conference with K&E team re case status.
05/20/20	V. Polnick	0.2	102.00	Discuss Second Day pleadings with K&E Team and timing.
05/20/20	D. Trevino	0.1	17.50	Attention to upcoming hearings and deadlines and circulate to team internally..

<u>Date</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Amount</u>	<u>Description</u>
05/21/20	M. Cavanaugh	1.1	825.00	Review and evaluate case administration including post-filing workstreams and upcoming conference with management.
05/21/20	V. Polnick	0.1	51.00	Circulate Work-in-Progress Chart and discuss with K. Peguero and J. Wertz.
05/21/20	D. Trevino	0.3	52.50	Prepare comparison documents of various second day motions for circulation to team internally.
05/21/20	K. Gradney	0.2	37.00	Prepare case timeline of upcoming dates and deadlines.
05/22/20	M. Cavanaugh	1.4	1,050.00	Prepare for and participate in telephone conference with K&E team re case status and next steps (1.1); correspond with K&E team re same (.3).
05/22/20	D. Trevino	0.1	17.50	Attention to upcoming deadlines and hearings and circulate to team internally.
05/26/20	V. Polnick	0.1	51.00	Communication with K&E regarding reclamation demand.
05/26/20	D. Trevino	0.2	35.00	Draft witness and exhibit list for the May 29, 2020 hearing and circulate to team internally.
05/27/20	K. Peguero	1.1	632.50	Assist with preparing witness and exhibit list (.6); advise G. Kavarsky regarding scheduling of second day motions (.5);
05/27/20	V. Polnick	0.1	51.00	Communication with the K&E team regarding subpoena.
05/28/20	K. Peguero	0.5	287.50	Review and comment on agenda (.1); advise Stretto regarding service issues (.4)
05/28/20	V. Polnick	0.1	51.00	Communication with K&E regarding agenda for hearing on May 29, 2020.
05/28/20	K. Gradney	0.2	37.00	Prepare for filing agenda for hearing set May 29 (.1); coordinate service of same with noticing agent (.1).
05/29/20	K. Peguero	0.3	172.50	Coordinate filing witness and exhibit list.
05/29/20	K. Gradney	0.3	55.50	Prepare e-witness and exhibit list filed on behalf of UMB Bank and circulate same to team.

<u>Date</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Amount</u>	<u>Description</u>
05/31/20	K. Peguero	0.2	115.00	Advise G. Kavarsky regarding second day hearing and process for resolution of first day motions
Total Case Administration		119.1	\$ 66,041.50	

Reporting:

05/19/20	M. Cavanaugh	2.1	1,575.00	Correspond with K&E team re postpetition workstream organization and next steps regarding reporting obligations (.9); review reporting obligations summary (.8); follow up correspond with K&E team re same (.4).
05/19/20	V. Polnick	0.1	51.00	Communication with K. Peguero and K&E Team regarding the timing for the IDI Motion.
05/21/20	K. Peguero	1.6	920.00	Participate in IDI (.4); analyze next steps and advise G. Kavarsky regarding motions and scheduling (.6); review and respond to creditor inquiries (.6)
Total Reporting		3.8	\$ 2,546.00	

Relief from Stay/Adequate Protection Proceedings:

05/27/20	V. Polnick	0.1	51.00	Communication with K&E regarding motion for relief from stay.
05/27/20	V. Polnick	0.1	51.00	Communication with K. Peguero and G. Kavarsky regarding stipulation for motion for relief from stay.
05/29/20	K. Peguero	0.6	345.00	Revise automatic stay stipulation (.6)
Total Relief from Stay/Adequate Protection Proceedings		0.8	\$ 447.00	

Meetings of and Communications with Creditors:

05/13/20	V. Polnick	0.1	51.00	Discussion with K&E Team regarding the 341 meeting.
05/14/20	J. Wertz	0.3	180.00	Review correspondence from Champion Energy (.2) and correspond with counsel with respect to contact for same (.1).
05/18/20	K. Peguero	0.5	287.50	Respond to creditor inquiries

<u>Date</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Amount</u>	<u>Description</u>
05/18/20	V. Polnick	0.3	153.00	Communication with creditor regarding claims and bar date.
05/18/20	V. Polnick	0.2	102.00	Communication with creditor regarding claims filing and process.
05/19/20	V. Polnick	0.2	102.00	Creditor communication regarding a Motion for Relief.
05/20/20	V. Polnick	0.1	51.00	Return calls of creditors.
05/26/20	J. Wertz	0.1	60.00	Correspond with D. Quick concerning consignment objection.
05/26/20	V. Polnick	0.1	51.00	Forward subpoena to the K&E team and creditor contact.
05/27/20	K. Peguero	0.4	230.00	Respond to creditor inquiries.
05/27/20	D. Trevino	1.0	175.00	Return calls for various shareholders and creditors and provided them with information for noticing agent.
05/29/20	K. Peguero	0.4	230.00	Respond to creditor inquiries (.4)
Total Meetings of and Communications with Creditors		3.7	\$ 1,672.50	

Fee/Employment Applications:

05/07/20	K. Gradney	0.4	74.00	Initial preparation of Jackson Walker retention application
05/18/20	D. Trevino	2.0	350.00	Draft and circulate to team the schedules for the Retention Application for Jackson Walker.
05/18/20	K. Gradney	0.8	148.00	Initial draft of retention application on behalf of Jackson Walker as co-counsel and conflicts counsel to the Debtors.
05/19/20	D. Trevino	2.0	350.00	Prepare Schedules for the Jackson Walker Retention Application.
05/21/20	D. Trevino	0.8	140.00	Draft of Schedule 1 for the Jackson Walker Retention Application.
05/22/20	K. Peguero	0.8	460.00	Review Interim Compensation motion and edit same.

<u>Date</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Amount</u>	<u>Description</u>
05/27/20	K. Peguero	0.9	517.50	Revise JW retention application (.9)
05/29/20	K. Peguero	0.1	57.50	Finalize and submit JW retention application to K&E and client for comment
Total Fee/Employment Applications		7.8	\$ 2,097.00	
<u>Business Operations:</u>				
05/11/20	J. Wertz	0.2	120.00	Correspond with J. Wuebker concerning OCP designation of Andrews Kurth.
05/19/20	J. Wertz	0.2	120.00	Correspond with M. Sprouse, counsel for landlord, concerning status of motion to file store closing procedures.
05/22/20	K. Peguero	0.7	402.50	Review and revise OCP Motion.
05/27/20	V. Polnick	0.1	51.00	Communication with K&E regarding critical vendor inquiry.
Total Business Operations		1.2	\$ 693.50	
<u>Financing/Cash Collections:</u>				
05/08/20	E. Freeman	2.1	1,627.50	Review the DIP motion and order.
05/26/20	K. Peguero	0.9	517.50	Respond to creditor inquiries regarding DIP and other issues
Total Financing/Cash Collections		3.0	\$ 2,145.00	
<u>Tax Issues:</u>				
05/26/20	V. Polnick	0.1	51.00	Communication with the K&E team regarding taxing authority inquiry.
Total Tax Issues		0.1	\$ 51.00	
<u>Board of Directors Matters:</u>				
05/15/20	E. Freeman	1.3	1,007.50	Review the examiner motion (1); confer regarding response strategy (.3).
05/20/20	V. Argeroplos	0.1	44.50	Confirm response deadline to motion to appoint an examiner.
05/20/20	V. Polnick	0.1	51.00	Communication with E. Freeman regarding the examiner request.

<u>Date</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Amount</u>	<u>Description</u>
05/26/20	M. Cavanaugh	2.1	1,575.00	Correspond with K&E team re postpetition workstream organization and next steps regarding recently filed motion to appoint examiner (.9); review pleadings re examiner motion (.8); follow up correspondence with K&E team re same (.4).
05/26/20	E. Freeman	2.1	1,627.50	Review and comment on the examiner response (1.3); strategize regarding the examiner motion (.8).
05/26/20	D. Trevino	0.3	52.50	Coordinate access for K. Peguero for the Deposition of Beilinson on May 28, 2020.
05/27/20	E. Freeman	0.8	620.00	Confer regarding strategy for the examiner motion.
05/27/20	K. Peguero	1.7	977.50	Review examiner motion (1.7)
05/28/20	M. Cavanaugh	3.2	2,400.00	Assist in preparation for contested hearing on Marble Ridge Motion to Appoint Examiner.
05/28/20	K. Peguero	4.7	2,702.50	Attend deposition of M. Beilinson (4.2); review draft reply and oversee filing (.5)
05/28/20	D. Trevino	0.2	35.00	Review the Debtor's Response to the Motion to Appoint Examiner and prepare same for filing.
05/28/20	K. Gradney	0.3	55.50	Prepare electronic witness and exhibit lists for hearing on motion to appoint examiner and circulate same to team.
05/29/20	M. Cavanaugh	6.7	5,025.00	Prepare for and attend contested hearing on motion to appoint an examiner.
05/29/20	E. Freeman	5.5	4,262.50	Confer regarding examiner motion strategy (2); Attend hearing on examiner motion (3.5).
05/29/20	K. Peguero	6.1	3,507.50	Prepare for hearing (.5); participate in hearing on examiner motion (5.6)
05/29/20	J. Wertz	3.3	1,980.00	Telephonic attendance at part of hearing on Marble Ridge motion to appoint examiner.
05/29/20	V. Polnick	5.5	2,805.00	Attended hearing on Marble Ridge motion to appoint examiner.
05/29/20	K. Gradney	5.9	1,091.50	Telephonically attend hearing on motion to appoint examiner and assist counsel.

<u>Date</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Amount</u>	<u>Description</u>
05/30/20	E. Freeman	0.5	387.50	Work on discovery matters pertaining to motion to appoint examiner.
Total Board of Directors Matters		50.4	\$ 30,207.50	
<u>Claims Administration and Objections:</u>				
05/22/20	K. Peguero	1.9	1,092.50	Review bar date motion and revise same.
05/25/20	M. Cavanaugh	1.3	975.00	Confer with KE team re potential litigation issues.
Total Claims Administration and Objections		3.2	\$ 2,067.50	
<u>Plan and Disclosure Statement (including Business Plan):</u>				
05/27/20	V. Polnick	0.1	51.00	Communication with K&E regarding Disclosure Statement motion.
05/27/20	D. Trevino	0.1	17.50	Prepare comparison document for the DS Motion and Order and circulated to team.
05/28/20	K. Peguero	1.2	690.00	Review and revise DS Motion (1.2)
05/29/20	K. Peguero	1.9	1,092.50	Review and revise DS Motion (1.9)
Total Plan and Disclosure Statement (including Business Plan)		3.3	\$ 1,851.00	
Total Fees				\$109,819.50